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ZIM AMERICAN INTEGRATED
SHIPPING SERVICES, INC.,

07 Civ. 3675 (JONES)

Plaintiff,

against -

AFFIDAVIT

ANDERSON INTERNATIONAL
GLOBAL, LLC, a/k/a WORLDWIDE
PAPER CO.,

Defendant.
-----X

STATE OF VIRGINIA }
INDEPENDENT CITY } ss:

ADRIENNE JAMES, being duly sworn, deposes and says:

1. I am the Manager of Credit and Collections for ZIM AMERICAN
INTEGRATED SHIPPING SERVICES, INC., the plaintiff in the referenced matter.
As such, I am personally familiar with the facts and circumstances herein, and I make
this affidavit in support of ZIM's Motion for Final Judgment by Default against
defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE
PAPER CO.

2. ZIM's records show that defendant ANDERSON
INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO. was the
consignee and receiver of goods carried on plaintiff's Vessels, and is the party
responsible to remit the ocean freight and related charges due as set forth in the
Complaint. Such charges are true and accurate pursuant to ZIM's published tariff, are
the responsibility of defendant ANDERSON INTERNATIONAL GLOBAL, LLC,
a/k/a WORLDWIDE PAPER CO.

WHEREFORE, plaintiff prays for the entry of judgment by default
against defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a
WORLDWIDE PAPER CO.

Dated: Norfolk, Virginia
August 9, 2007


Adrienne James

Sworn to before me this
15th day of August, 2007


Notary Public

#191479

My commission expires Jan. 31, 2010

SOUTHERN DISTRICT OF NEW YORK

ZIM AMERICAN INTEGRATED
SHIPPING SERVICES, INC.,

07 CIV. 3675 (BSJ)

Plaintiff,
- against -

AFFIDAVIT FOR
JUDGMENT BY
DEFAULT

ANDERSON INTERNATIONAL
GLOBAL, LLC, a/k/a WORLDWIDE
PAPER CO.,

Defendant.

STATE OF NEW YORK }
COUNTY OF NEW YORK } SS.:

ALBERT J. AVALLONE, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and am a member of the firm of the Law Offices of Albert J. Avallone & Associates, attorneys for the plaintiff in the above entitled action, and I am familiar with all the facts and circumstances in this action.

2. I make this affidavit in support of plaintiff's application for the entry of a default judgment against defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO.

3. This is an action to recover unpaid ocean freight owed by defendant to plaintiff for the transportation of certain goods of the defendant by the plaintiff.

4. Jurisdiction of the subject matter of this action is based on maritime jurisdiction.

5. This action was commenced by the filing of a Summons and Complaint. A copy of the Summons and Complaint was served on defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO. on May 17, 2007 by personal service on Andrew Sagartz, Agent, and a proof

6. This action seeks judgment for the liquidated amount of \$16,059.00 plus interest at 6% from July 12, 2006, as shown by the annexed Statement, which is justly due and owing, and no part of which has been paid except as therein set forth.

7. The disbursements sought to be taxed have been made in this action or will necessarily be made or incurred herein.

WHEREFORE, plaintiff requests the entry of Default and the entry of the annexed Judgment against defendant.

Dated: New York, New York
August 16, 2007


ALBERT J. AVALLONE

Sworn to before me this
16th day of August, 2007


Notary Public

DOROTHY C. MERITE
Notary Public, State of New York
No. 31-4961897
Qualified in New York County
My Commission Expires 2/12/10

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ZIM AMERICAN INTEGRATED
SHIPPING SERVICES, INC.,

07 CIV. 3675 (BSJ)

Plaintiff,

- against -

ANDERSON INTERNATIONAL
GLOBAL, LLC, a/k/a WORLDWIDE
PAPER CO.,

Defendant.

-----X

STATE OF NEW YORK }
COUNTY OF NEW YORK } SS.:

ALBERT J. AVALLONE, being duly sworn, deposes and says:

I am a member of the Bar of the Court and am a member of the firm
of the Law Offices of Albert J. Avallone & Associates, attorneys for the plaintiff. As
such, I am familiar with the facts and circumstances in the above entitled action.

Jurisdiction of plaintiff's claim is based upon maritime jurisdiction.

In my opinion, this Court has jurisdiction over the person and subject
matter of this action.

Dated: New York, New York
August 16, 2007


ALBERT J. AVALLONE

Sworn to before me this
16th day of August, 2007


Notary Public

DOROTHY C. MERITE
Notary Public, State of New York
No. 31-4951397
Qualified in New York County
My Commission Expires 2/12/10